

1 David N. Chandler, Sr. SBN 60780
David N. Chandler, Jr. SBN 235427
2 DAVID N. CHANDLER, p.c.
1747 Fourth Street
3 Santa Rosa, CA 95404
Telephone: (707) 528-4331

4 Attorneys for Debtors
5

6 UNITED STATES BANKRUPTCY COURT
7
8 NORTHERN DISTRICT OF CALIFORNIA

9 IN RE: CASE No. 17-10828 WJL

10 FLOYD E. SQUIRES, III and CHAPTER 11
11 BETTY J. SQUIRES,

12 Debtors. /

DECLARATION OF DAVID N. CHANDLER
IN SUPPORT OF MOTION FOR FURTHER
USE OF CASH COLLATERAL

13 Date: February 1, 2018

Time: 11:00 a.m.

14 Place: U.S. Courthouse
3140 Boeing Avenue
15 McKinleyville, CA

16 I, DAVID N. CHANDLER, declare and say:

17 1. That if called as a witness, I am competent to testify to
18 the within matters from my own knowledge.

19 2. Debtors tendered payment from cash collateral to Mark
20 Adams, California Receivership Group by two checks, each in the
21 amount of \$1,500 pursuant to the express terms of the budget
22 attached to the Cash Collateral Order entered herein on January 4,
23 2018.

24 3. Said checks were marked "VOID" and returned to my office
25 together with a letter dated January 17, 2018. Said checks and
26 letter were received in my office January 24, 2018. A true and
27 correct copy of the said letter and the two accompanying voided
28

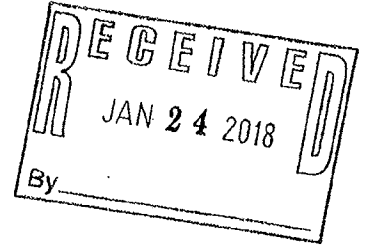
1 checks is attached hereto as Exhibit A.

2 Executed under penalty of perjury this 29th day of January,
3 2018 at Santa Rosa, California.

4 /s/David N. Chandler
5 David N. Chandler
6 Attorney for Debtors
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CALIFORNIA
RECEIVERSHIP
GROUP, PBC



January 17, 2018

David N. Chandler, Sr.
DAVID N. CHANDLER, p.c.
1747 Fourth Street
Santa Rosa, CA 95404

RE: In re: Floyd E. Squires, III and Betty J. Squires, Case No 17-10828 WJL

Mr. Chandler,

On January 16, 2018 California Receivership Group received two checks payable to Mark Adams. These checks were first sent to local counsel in Eureka, then forwarded to our office. Please note that all communications should go through this office going forward.

Also, please note that no agreement was made regarding the payments, and California Receivership Group is not accepting monthly payments of \$1,500. Any offer to pay \$1,500 monthly in place of the obligations imposed by the Superior Court's February 21, 2017 Order is rejected.

If the Bankruptcy Court later reviews any plan or payment schedule, then CRG retains the right to object or later make an agreement regarding the payments. But as there is no agreement or order in place, those payments are not accepted or appropriate. Enclosed herein you will find the following:

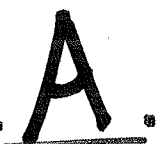
1. Voided check #259 from Floyd E. Squires and Betty J. Squires in the amount of \$1,500; and
2. Voided check #260 from Floyd E. Squires and Betty J. Squires in the amount of \$1,500.

If you have any questions, please contact me at aadams@calreceivers.com or call our office at 310-471-8181.

Sincerely,

Andrew Adams
General Counsel
California Receivership Group, PBC

2716 Ocean Park Blvd • Suite 3010 • Santa Monica, CA 90405
Phone: (310) 471-8181 • Fax: (310) 471-8180 • Website: www.calreceivers.com

EXHIBIT " 

FLOYD E SQUIRES
BETTY J SQUIRES
219 5TH ST. STE 204
EUREKA, CA 95501-0303

90-2267/1211 260

Date 1-3-18

PAY TO THE ORDER OF Mark Adams \$ 1500.00

Fifteen hundred and no/100 Dollars

usbank.

Memo Jan 2018 pmt. Betty Squires

⑆121122676⑆ 157516374822⑈0260

FLOYD E SQUIRES
BETTY J SQUIRES
219 5TH ST. STE 204
EUREKA, CA 95501-0303

90-2267/1211 259

Date 1-3-18

PAY TO THE ORDER OF Mark Adams \$ 1500.00

Fifteen hundred and no/100 Dollars

usbank.

Memo December 2017 pmt. Betty Squires

⑆121122676⑆ 157516374822⑈0259